

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

L. Lin Wood, Jr.,

Plaintiff,

v.

Brad Raffensperger, in his official capacity
as Secretary of the State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO.
20-cv-04651-SDG

AFFIDAVIT OF ANGELA THOMAS

Personally appeared before me, the undersigned subscribing officer, duly authorized to administer oaths, ANGELA THOMAS who being duly sworn, deposed and stated as follows:

1. My name is ANGELA THOMAS. I am over 18 years of age, a citizen of the State of Georgia, suffer from no legal disabilities, and am otherwise competent to testify to the matters contained herein. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.

2. I am a resident of and registered elector in Fulton County, Georgia.

3. On November 15, 2020, I was present as an observer credentialed by the Democratic Party of Georgia to observe the statewide hand recount of ballots cast in the 2020 Presidential Election in Fulton County, Georgia (the "Recount").

4. I arrived at the Georgia World Congress Center, where the Recount was held, at approximately 6:30 a.m.

5. On arrival, I had no problems accessing the space where the Recount was happening. There was a sign that said "Monitors" when I walked in, and I went directly to it. I sat for an hour or so before counting began, around 7:30 a.m.

6. I did not observe anyone claiming that the Recount had "just finished" or was otherwise complete, until after 9 a.m., when we were told that each party (Democratic and Republican) had to reduce number on the floor to 17, and myself and several others prepared to leave.

7. While I was observing the Recount, there were approximately 40 other credentialed observers present, with about 20 representing the Democratic Party of Georgia, and at least 20 I understood to be representing the Georgia Republican Party.

8. At no time did I see or hear of a credentialed observer being denied access to the Recount.

9. While observing, I had access to view each of the two-person audit teams from about six feet away. From this distance, I could hear the auditors announce and discuss the votes they counted on each ballot. I could see into what designated stack a given audit team placed each ballot.

10. Based on my personal observation, there were no inaccuracies, improprieties, inconsistencies, or other problems during the Recount. The audit teams I observed all appeared to be counting correctly.

11. I reviewed the Affidavit of Amanda Coleman stating that she saw people walking around and that there were no observers at the tables where counting was happening. However, observers were not assigned to specific tables and that was not our role. We were instructed to roam and observe the activities at multiple tables.

12. I reviewed the Affidavit of Maria Diedrich, stating that tables were left unattended. I did not observe any tables left unattended, but I did hear an announcement that at least one person must remain at each counting table at all times.

13. Around 9 a.m., after approximately 1.5 hours of observation, I left the Recount because the county elections officials announced that they were limiting

the number of observers on the floor to 17 per party. I would estimate that at least 30 credentialed observers were still there observing the Recount when I left.

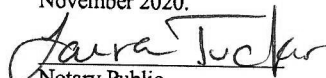
14. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

15. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Executed this 18th day of November 2020.

 (signed)
Angela Thomas

Sworn to and subscribed to
before me this 18th day of
November 2020.


Notary Public

My commission expires: March 28, 2023

